

2/8/84

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| EPA POTENTIAL HAZARDOUS WASTE SITE IDENTIFICATION AND PRELIMINARY ASSESSMENT | | REGION 6 | SITE NUMBER (to be assigned by HQ) TX06203 |
|--|----------------|--|---|
| NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections. | | | |
| GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II (Preliminary Assessment). File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460. | | | |
| I. SITE IDENTIFICATION | | | |
| A. SITE NAME Van Waters and Rogers Company | | B. STREET (or other identifier) 4707 Alpha Rd., P.O. Box 34749 | |
| C. CITY Dallas | D. STATE TX | E. ZIP CODE 75234 | F. COUNTY NAME Dallas |
| G. OWNER/OPERATOR (if known) 1. NAME Van Waters and Rogers, Division of Univor (Jim Helm, Whse. Mgr.) | | 2. TELEPHONE NUMBER (214) 234-9111 | |
| H. TYPE OF OWNERSHIP <input type="checkbox"/> 1. FEDERAL <input type="checkbox"/> 2. STATE <input type="checkbox"/> 3. COUNTY <input type="checkbox"/> 4. MUNICIPAL <input checked="" type="checkbox"/> 5. PRIVATE <input type="checkbox"/> 6. UNKNOWN | | | |
| I. SITE DESCRIPTION The site is a warehouse/distribution facility for various kinds of chemicals. A large number of tanks and drums full of raw materials and products are (see Attachment A). | | | |
| J. HOW IDENTIFIED (i.e., citizen's complaints, OSHA citations, etc.) Notified under RCRA | | | K. DATE IDENTIFIED (mo., day, & yr.) 9/24/79 |
| L. PRINCIPAL STATE CONTACT 1. NAME Dan Scheppers, TDWR | | 2. TELEPHONE NUMBER (512) 475-1344 | |
| II. PRELIMINARY ASSESSMENT (complete this section last) | | | |
| A. APPARENT SERIOUSNESS OF PROBLEM <input type="checkbox"/> 1. HIGH <input type="checkbox"/> 2. MEDIUM <input type="checkbox"/> 3. LOW <input checked="" type="checkbox"/> 4. NONE <input type="checkbox"/> 5. UNKNOWN | | | |
| B. RECOMMENDATION <input checked="" type="checkbox"/> 1. NO ACTION NEEDED (no hazard) <input type="checkbox"/> 2. SITE INSPECTION NEEDED a. TENTATIVELY SCHEDULED FOR: b. WILL BE PERFORMED BY: SUPERFUND FILE DEC 14 1992 REORGANIZED <input type="checkbox"/> 2. IMMEDIATE SITE INSPECTION NEEDED a. TENTATIVELY SCHEDULED FOR: b. WILL BE PERFORMED BY: <input type="checkbox"/> 4. SITE INSPECTION NEEDED (low priority) | | | |
| C. PREPARER INFORMATION 1. NAME David R. Wilkes, Engineering-Science, Inc. 2. TELEPHONE NUMBER (512) 477-9901 3. DATE (mo., day, & yr.) 1/17/84 | | | |
| III. SITE INFORMATION | | | |
| A. SITE STATUS <input checked="" type="checkbox"/> 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.) (see Attachment A) <input type="checkbox"/> 2. INACTIVE (Those sites which no longer receive wastes.) <input type="checkbox"/> 3. OTHER (specify): | | | |
| B. IS GENERATOR ON SITE? <input type="checkbox"/> 1. NO <input checked="" type="checkbox"/> 2. YES (specify generator's four-digit SIC Code): 5161 | | | |
| C. AREA OF SITE (in acres) 11.25 | | D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES 1. LATITUDE (deg.-min.-sec.) N 32°56'00" 2. LONGITUDE (deg.-min.-sec.) W 96°49'45" | |
| E. ARE THERE BUILDINGS ON THE SITE? <input type="checkbox"/> 1. NO <input checked="" type="checkbox"/> 2. YES (specify): Warehouse, offices, and covered storage area 9078608 | | | |

IV. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

| X | A. TRANSPORTER | X | B. STORER | X | C. TREATER | X | D. DISPOSER |
|---|---------------------|---|------------------------|---|---------------------------------------|---|--------------------------|
| | 1. RAIL | | 1. PILE | | 1. FILTRATION | | 1. LANDFILL |
| | 2. SHIP | | 2. SURFACE IMPOUNDMENT | | 2. INCINERATION | | 2. LANDFARM |
| | 3. BARGE | X | 3. DRUMS | | 3. VOLUME REDUCTION | | 3. OPEN CUMP |
| X | 4. TRUCK | | 4. TANK, ABOVE GROUND | | 4. RECYCLING/RECOVERY | | 4. SURFACE IMPOUNDMENT |
| | 5. PIPELINE | | 5. TANK, BELOW GROUND | | 5. CHEM./PHYS. TREATMENT | | 5. MIDNIGHT CUMPING |
| | 6. OTHER (specify): | | 6. OTHER (specify): | | 6. BIOLOGICAL TREATMENT | | 6. INCINERATION |
| | | | | | 7. WASTE OIL REPROCESSING | | 7. UNDERGROUND INJECTION |
| | | | | X | 8. SOLVENT RECOVERY | | 8. OTHER (specify): |
| | | | | X | 9. OTHER (specify): Neutralization | | |

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED This site is located in the Cotton Belt Railroad Metropolitan Industrial Park in Farmers Branch, an area with active commercial/industrial facilities. There are numerous storage areas (both drums and tanks) on the site, but most of these are not wastes but product. The waste-handling operations consist of a neutralization tank for treatment of corrosive wastes (D002), (see Attachment A)

V. WASTE RELATED INFORMATION

A. WASTE TYPE

☐ 1 UNKNOWN ☒ 2 LIQUID ☐ 3. SOLID ☒ 4. SLUDGE ☐ 5. GAS

B. WASTE CHARACTERISTICS

☐ 1. UNKNOWN ☒ 2. CORROSIVE ☒ 3. IGNITABLE ☐ 4. RADIOACTIVE ☐ 5. HIGHLY VOLATILE
☒ 6. TOXIC ☐ 7. REACTIVE ☐ 8. INERT ☐ 9. FLAMMABLE

☐ 10. OTHER (specify):

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

Yes; manifests from off-site disposal

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

| a. SLUDGE | b. OIL | c. SOLVENTS | d. CHEMICALS | e. SOLIDS | f. OTHER |
|--|----------------------|---|---|-------------------------------|------------------------------|
| AMOUNT 7 | AMOUNT None | AMOUNT 36,000 | AMOUNT See Attachment A | AMOUNT None | AMOUNT None |
| UNIT OF MEASURE 55-gal drums/month | UNIT OF MEASURE | UNIT OF MEASURE kg/year | UNIT OF MEASURE | UNIT OF MEASURE | UNIT OF MEASURE |
| X (1) PAINT, PIGMENTS | X (1) OILY WASTES | X (1) HALOGENATED SOLVENTS | X (1) ACIDS | X (1) FLYASH | X (1) LABORATORY PHARMACEUT. |
| (2) METALS SLUDGES | (2) OTHER (specify): | X (2) NON-HALOGENATED SOLVENTS | (2) PICKLING LIQUORS | (2) ASBESTOS | (2) HOSPITAL |
| (3) POTW | | (3) OTHER (specify): solvent recycling | (3) CAUSTICS | (3) MILLING/ MINE TAILINGS | (3) RADIOACTIVE |
| (4) ALUMINUM SLUDGE | | | (4) PESTICIDES | (4) FERROUS SMLTG. WASTES | (4) MUNICIPAL |
| X (5) OTHER (specify): spent halo- genated solvent sludge | | | (5) DYES/INKS | (5) NON-FERROUS SMLTG. WASTES | (5) OTHER (specify): |
| | | | (6) CYANIDE | (6) OTHER (specify): | |
| | | | (7) PHENOLS | | |
| | | | (8) HALOGENS | | |
| | | | (9) PCB | | |
| | | | (10) METALS | | |
| | | | X (11) OTHER (specify): various chemicals | | |

V. WASTE RELATED INFORMATION (continued)

3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard).

Various toxic organic chemicals
 Non-halogenated solvents
 Solvent sludge

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.

VI. HAZARD DESCRIPTION

| A. TYPE OF HAZARD | B. POTENTIAL HAZARD (mark 'X') | C. ALLEGED INCIDENT (mark 'X') | D. DATE OF INCIDENT (mo., day, yr.) | E. REMARKS |
|--|--------------------------------|--------------------------------|-------------------------------------|------------|
| 1. NO HAZARD | X | | | |
| 2. HUMAN HEALTH | | | | |
| 3. NON-WORKER INJURY/EXPOSURE | | | | |
| 4. WORKER INJURY | | | | |
| 5. CONTAMINATION OF WATER SUPPLY | | | | |
| 6. CONTAMINATION OF FOOD CHAIN | | | | |
| 7. CONTAMINATION OF GROUND WATER | | | | |
| 8. CONTAMINATION OF SURFACE WATER | | | | |
| 9. DAMAGE TO FLORA/FAUNA | | | | |
| 10. FISH KILL | | | | |
| 11. CONTAMINATION OF AIR | | | | |
| 12. NOTICEABLE ODORS | | | | |
| 13. CONTAMINATION OF SOIL | | | | |
| 14. PROPERTY DAMAGE | | | | |
| 15. FIRE OR EXPLOSION | | | | |
| 16. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS | | | | |
| 17. SEWER, STORM DRAIN PROBLEMS | | | | |
| 18. EROSION PROBLEMS | | | | |
| 19. INADEQUATE SECURITY | | | | |
| 20. INCOMPATIBLE WASTES | | | | |
| 21. MIDNIGHT DUMPING | | | | |
| 22. OTHER (specify): | | | | |

VII. PERMIT INFORMATION

A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE.

- ☐ 1. NPDES PERMIT ☐ 2. SPCC PLAN ☐ 3. STATE PERMIT (specify): _____
☐ 4. AIR PERMITS ☐ 5. LOCAL PERMIT ☒ 6. RCRA TRANSPORTER
☒ 7. RCRA STORER ☒ 8. RCRA TREATER ☐ 9. RCRA DISPOSER

☒ 10. OTHER (specify): EPA ID No. TXD042291591, Solid Waste-Registration No. (TDWR) 31657

B. IN COMPLIANCE?

- ☐ 1. YES ☐ 2. NO ☒ 3. UNKNOWN

4. WITH RESPECT TO (list regulation name & number): _____

VIII. PAST REGULATORY ACTIONS

- ☒ A. NONE ☐ B. YES (summarize below)

IX. INSPECTION ACTIVITY (past or on-going)

- ☐ A. NONE ☒ B. YES (complete items 1, 2, 3, & 4 below)

| 1. TYPE OF ACTIVITY | 2. DATE OF PAST ACTION (mo., day, & yr.) | 3. PERFORMED BY: (EPA/State) | 4. DESCRIPTION |
|---------------------|--|------------------------------|--|
| Site inspection | 9/30/80 | State, TDWR | Site inspection for the PA. Inspection of facilities and records |
| Site inspection | 12/83 | State, TDWR | RCRA compliance inspection |
| | | | |

X. REMEDIAL ACTIVITY (past or on-going)

- ☒ A. NONE ☐ B. YES (complete items 1, 2, 3, & 4 below)

| 1. TYPE OF ACTIVITY | 2. DATE OF PAST ACTION (mo., day, & yr.) | 3. PERFORMED BY: (EPA/State) | 4. DESCRIPTION |
|---------------------|--|------------------------------|----------------|
| | | | |
| | | | |
| | | | |

NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment (Section II) information on the first page of this form.

ATTACHMENT A

POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT SUPPLEMENT SHEET

Instruction - This sheet is provided to give additional information in explanation of a question on the form T2070-2.

Corresponding
number on form

Additional Remark and/or Explanation

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---------|--|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|--|--|--|--|--|------|------|--|--|--|--|--|------|------|--|--|--|--|--|------|------|--|--|--|--|--|------|------|--|--|--|--|--|------|--|
| I-I | on the site. A drum storage area for wastes is also on the site. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| III-A | The site has been operating since 8/4/69. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| IV-E | <p>a steam distillation system for recycling spent halogenated solvents, and a drum storage area. The drum storage facility is a fenced concrete storage area for short-term storage of returned 55-gallon drums of solvent before recycling and interim storage of recycling sludge before off-site disposal. This facility has a capacity of about 100 55-gallon drums. Off-site disposal in the past (before 1979) was provided by Bio-Ecology and Dal-Worth Industries. All off-site shipments are manifested properly. There are no inactive facilities on the site, although the solvent recovery system may be operated intermittently. Product storage areas are bermed (tanks) and on concrete pads (drums) so that any spills should be controlled adequately.</p> <p>The site was given interim status by EPA under RCRA for treatment of waste F002 (solvent recovery) and D002 (neutralization) as well as for the drum storage area for various solvent wastes. The facility attempts to meet the 90-day storage exclusion rule under RCRA for their drum storage area, but they obtained interim status for it in case they needed to store for greater than 90 days. The recent (12/83) RCRA inspection resulted in questions only about the solvent recycling process. No other problems were noted.</p> <p>No further action is recommended because of the recent inspection activity by the TDWR and because of the active status of all waste-handling facilities.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| V-C-2-d | <p>The following list contains those compounds that would become wastes only if spilled, contaminated, or off-specification:</p> <table border="0"> <tr> <td>U002</td> <td>U210</td> <td>U037</td> <td>U069</td> <td>U134</td> <td>U213</td> <td>P035</td> </tr> <tr> <td>U031</td> <td>U220</td> <td>U043</td> <td>U107</td> <td>U140</td> <td>U219</td> <td>P044</td> </tr> <tr> <td>U112</td> <td>U226</td> <td>U044</td> <td>U100</td> <td>U165</td> <td>P009</td> <td>P049</td> </tr> <tr> <td>U154</td> <td>U228</td> <td>U052</td> <td>U122</td> <td>U171</td> <td>P022</td> <td>P051</td> </tr> <tr> <td>U159</td> <td>U239</td> <td>U054</td> <td>U123</td> <td>U188</td> <td>P029</td> <td>P059</td> </tr> <tr> <td>U161</td> <td>U036</td> <td>U057</td> <td>U133</td> <td>U197</td> <td>P030</td> <td>P066</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td>P090</td> <td>P096</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td>P098</td> <td>P104</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td>P106</td> <td>P108</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td>P115</td> <td>P117</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td>P121</td> <td></td> </tr> </table> | U002 | U210 | U037 | U069 | U134 | U213 | P035 | U031 | U220 | U043 | U107 | U140 | U219 | P044 | U112 | U226 | U044 | U100 | U165 | P009 | P049 | U154 | U228 | U052 | U122 | U171 | P022 | P051 | U159 | U239 | U054 | U123 | U188 | P029 | P059 | U161 | U036 | U057 | U133 | U197 | P030 | P066 | | | | | | P090 | P096 | | | | | | P098 | P104 | | | | | | P106 | P108 | | | | | | P115 | P117 | | | | | | P121 | |
| U002 | U210 | U037 | U069 | U134 | U213 | P035 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| U031 | U220 | U043 | U107 | U140 | U219 | P044 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| U112 | U226 | U044 | U100 | U165 | P009 | P049 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| U154 | U228 | U052 | U122 | U171 | P022 | P051 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| U159 | U239 | U054 | U123 | U188 | P029 | P059 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| U161 | U036 | U057 | U133 | U197 | P030 | P066 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | P090 | P096 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | P098 | P104 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | P106 | P108 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | P115 | P117 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | P121 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

ATTACHMENT B
REJECTION FORM

| | | |
|-----------------|----------------------------------|---|
| <u>HAZSIT #</u> | <u>SITE NAME</u> | <u>FORM # and</u> <u>DATE COMPLETED by STATE</u> |
| TX 6203 | VAN WATERS AND ROGERS COMPANY | T2070-2 1/17/84 |

EXPLANATION FOR REJECTION:
(DEFICIENCIES)

Section IV (B)
- NO SIC Code

SUGGESTED REMEDY FOR
DEFICIENCIES:

Reference to State Index of Manufacturers

SIGNATURE:

A. J. Anderson

NAME OF REVIEWER

DATE: 2/24/84

TXD 042 291591

SUPERFUND
FILE

DEC 07 1992

REORGANIZED



Photographer / Witness

David Wilkes

Date / Time / Direction

1/4/84 2:30 P Northeast

Comments: First frame of panorama
at Van Waters and Rogers showing
bulk product storage tanks.



Photographer / Witness

David Wilkes

Date / Time / Direction

1/4/84 2:30 P East

Comments: Second frame of
panorama showing drum storage
area and warehouse.



Photographer / Witness

David Wilkes

Date / Time / Direction

1/4/84 2:30 P Southeast

Comments: Third frame of
panorama showing drum storage
area (product).